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ROBERT GUILD

Attorney at Law

314 Pall Mall • Columbia, South Carolina 29201 • 803-252-1419

July 31, 2009

Mr. Charles Terreni  
Chief Clerk  
Public Service Commission of South Carolina  
Synergy business Park, Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

In Re: South Carolina Electric & Gas Company Request for Approval of Demand Side Management Plan Including a Demand Side Management Rate Rider and Portfolio of Energy Efficiency Programs  
Docket No. 2009-261-E

Dear Mr. Terreni:

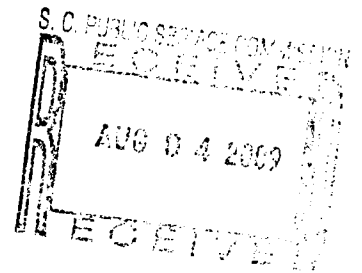
Enclosed please find for filing and consideration the **PETITION TO INTERVENE BY FRIENDS OF THE EARTH** in the above referenced matter, together with Certificate of Service reflecting service upon all parties of record.  
With kind regards I am

Sincerely,

  
Robert Guild

Encl.s  
CC: All Parties

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2009-261-E



In Re: South Carolina Electric & Gas                     )  
Company Request for Approval of Demand                )  
Side Management Plan Including a Demand                )  
Side Management Rate Rider and Portfolio of            )  
Energy Efficiency Programs                                 )

**PETITION TO INTERVENE BY  
FRIENDS OF THE EARTH**

Friends of the Earth ("FoE"), on behalf of its members who may be adversely affected by the approval of the subject Request, hereby petitions the Commission pursuant to R. 103-825 of the Commission's rules to intervene and be made a party of record in the above-referenced proceeding. In support of this Petition, FoE would respectfully show:

1. South Carolina Electric & Gas Company herein seeks approval of a proposed energy efficiency and demand side management program as well as the recovery of increased revenues and returns in connection with such program.

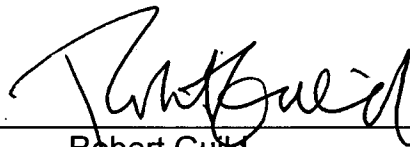
2. FoE is affiliated with the world's largest environmental advocacy network in 70 countries. FoE has worked for over 38 years to promote a healthy and just world and to shift the U.S. and global economies to a cleaner energy basis, using the latest in efficiency improvements, along with renewable energy sources such as wind, geothermal, and solar power. Members of FoE are ratepayers of SCE&G and residents of South Carolina who have direct and material interests in access to economical, clean, and sustainable electric service as well as in protecting their use and enjoyment of the

natural resources of the State from the harm threatened by pollution and climate change. FoE's members have an interest in the implementation of the most effective and timely energy efficiency and demand reduction measures by SCE&G to reduce the wasteful use of electricity, save ratepayers money and reduce the need for the construction of costly and dangerous new generating plants such as SCE&G's proposed new nuclear units. Members of FoE would be harmed by the approval of an energy efficiency and demand side management program which fails to protect their interests.

3. FoE lacks sufficient information at this time to fully develop and state its position on the Request; or to indicate the amount of time expected for its presentation at the hearing in this matter.

4. Approval of this Petition to Intervene and allowing FoE to be made a party of record is in the public interest. It will serve to more fully develop the record and improve the resulting decision in this matter and is consistent with the Commission's Rules of Practice and Procedure.

WHEREFORE, Petitioner FoE prays for an order granting this Petition; making it a full party of record; and granting such further relief as may be just.



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ATTORNEY FOR PETITIONER  
FRIENDS OF THE EARTH

July 31, 2009

BEFORE  
THE PUBLIC SERVICE COMMISSION OF  
SOUTH CAROLINA  
DOCKET NO. 2009-261-E

In Re: South Carolina Electric & Gas                     )  
Company Request for Approval of Demand                )  
Side Management Plan Including a Demand                )  
Side Management Rate Rider and Portfolio of            )  
Energy Efficiency Programs                                    )

CERTIFICATE OF SERVICE

I hereby certify that on this date I served the above **PETITION TO INTERVENE BY FRIENDS OF THE EARTH** by placing copies of same in the United States Mail, first-class postage prepaid, addressed to:

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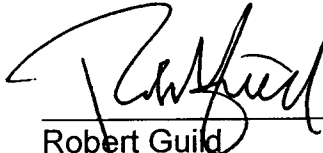
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July 31, 2009

A handwritten signature in black ink, appearing to read "Robert Guild", is written over a horizontal line.

Robert Guild  
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ATTORNEY FOR PETITIONER  
FRIENDS OF THE EARTH